

# **EXHIBIT 6**

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**From:** Houghton-Larsen, M Annie  
**Sent:** Monday, December 30, 2024 3:11 PM  
**To:** Ted Goodman  
**Cc:** Joseph Cammarata, Esq.; Nathan, Aaron E.; Governski, Meryl Conant  
**Subject:** RE: Freeman v. Giuliani - Court Order

Ted,

You refer to coordinating with “attorneys.” To the extent that you are represented by counsel, please direct us to him or her. We had been under the impression, based on representations from Mr. Giuliani’s counsel, that you are unrepresented and that Mr. Cammarata is not your attorney, which is why he has repeatedly stated he will not help coordinate scheduling for your deposition.

We properly served you with a deposition subpoena which stated in clear terms that “YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. Willkie Farr & Gallagher 787 Seventh Avenue New York, NY 10019 (within 100 miles of where you are employed and regularly conduct business) 12/30/2024 1:00 p.m.” A subpoena is not a request, it operates with the force of a court order, and commands you to appear at the time, date, and place set forth therein. You did not seek any relief from the Court regarding that date and time, and were thus required to appear at Willkie’s New York offices at 1 p.m. today. We granted you a courtesy of rescheduling the deposition this morning only as a courtesy because of your representation that you were sick and would be available for a deposition tomorrow at 9 a.m. We relied on that representation, but we are under no obligation to agree to any further modifications. We cannot and will not hold your deposition tomorrow at 1 p.m. If you do not appear tomorrow at 9 a.m., that is your choice, but not one we will condone.

To further clarify, I had no missed or unanswered calls from you at the time I received your email at 2:37 p.m. today. You have since called my office at least 3 times, I answered once and conveyed that I would prefer to keep our communications to email in order to ensure a clear record, especially as you are not represented by counsel. I am not sure what to make of your invocation of Mr. Nathan or your implication that there is some personal reason why I would not answer your call, but you can trust that my colleague, Mr. Nathan, and I are on the same page in all respects, and that our insistence to memorialize our conversations is rooted in professionalism.

**M. Annie Houghton-Larsen**  
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Pronouns: she, her, hers

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**From:** Ted Goodman <tedgoodman81@gmail.com>  
**Sent:** Monday, December 30, 2024 3:01 PM  
**To:** Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>  
**Cc:** Joseph Cammarata, Esq. <Joe@cammaratalawpc.com>; Nathan, Aaron E. <ANathan@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>  
**Subject:** Re: Freeman v. Giuliani - Court Order

\*\*\* EXTERNAL EMAIL \*\*\*

I just called Ms. Houghton-Larsen, who has now indicated she will not be taking my phone calls.

This is a troubling development. I'm not sure why you are choosing to act in such an unprofessional manner towards me.

A phone call is the best way to get this done.

Ted Goodman  
9062315849

On Mon, Dec 30, 2024, 2:37 PM Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)> wrote:

Ms. Houghton-Larsen and team,

I'm asking, because I too have to coordinate with attorneys and staff, for 1 pm. Note the following, and hold the catering. Since this is by zoom, you don't need any additional staff on my behalf.

1. We never had an explicit agreement for 9 am. We discussed it, but didn't lock it in. Now I am offering 1 pm ET. If not, let's look at Wednesday?
2. As a reminder, I had asked last week (two weeks ago?) for additional time due to a serious illness.
3. As far as communications, How about answering my calls? I'm trying to work with you guys, yet you refuse to even answer my phone calls. It's extremely unprofessional. There is absolutely no reason for your hostile posturing here. I'm being reasonable and asking for small accommodations due to an illness.

I don't have the resources that you have. This is very unprofessional, Ms. Houghton-Larsen. And I am very professional and courteous towards you. Please, all I ask is for the same basic respect I am showing you.

Please call me at (906) 231-5849. I'll talk to Mr. Nathan if Ms. Houghton-Larsen doesn't want to talk to me on the phone.

Ted Goodman

On Mon, Dec 30, 2024, 2:03 PM Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)> wrote:

Ted,

As I emailed previously, we will not agree to any further extensions. We granted your request *this morning* to postpone your properly served and noticed deposition (that was supposed to be happening *right now*) to tomorrow at 9 a.m. by zoom.

We will see you tomorrow at 9 a.m. as agreed.

**M.Annie Houghton-Larsen**

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Pronouns: she, her, hers

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**From:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>

**Sent:** Monday, December 30, 2024 1:30 PM

**To:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>

**Cc:** Joseph Cammarata, Esq. <[Joe@cammaratalawpc.com](mailto:Joe@cammaratalawpc.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>

**Subject:** Re: Freeman v. Giuliani - Court Order

\*\*\* EXTERNAL EMAIL \*\*\*

Can we please do 1 pm ET tomorrow?

Thank you.

On Mon, Dec 30, 2024, 1:09 PM Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)> wrote:

To respect everyone's time, let's hold off on scheduling for 9 am.

My goal is to handle this asap and ro comply with court orders.

I will respond asap with a time that works.

For starters, let's do 11 am or later if possible. We don't need special catering or anything like that.

Im very low maintenance and this will be via zoom, unless you intend to pay my travel expenses and hotel.

On Mon, Dec 30, 2024, 1:07 PM Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)> wrote:

This is not disrespectful.

Let's not lock in 9 am ET yet until I know more about schedule and if I will be at doctor appointment.

No disrespect intended

On Mon, Dec 30, 2024, 11:20 AM Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)> wrote:

Ted,

Your disrespect of other people's time, including that of support staff, has been noted.

We will see you tomorrow at 9 a.m. on zoom for your deposition. For avoidance of doubt, we will not be agreeable to any further delays.

Thank you,

**M.Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
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Pronouns: she, her, hers

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**From:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>  
**Sent:** Monday, December 30, 2024 11:12 AM  
**To:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Cc:** Joseph Cammarata, Esq. <[Joe@cammaratalawpc.com](mailto:Joe@cammaratalawpc.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>  
**Subject:** Re: Freeman v. Giuliani - Court Order

\*\*\* EXTERNAL EMAIL \*\*\*

9 am tomorrow please.

Thanks. You can tell caterers to stay home! Thank you

On Mon, Dec 30, 2024, 11:03 AM Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)> wrote:

Ted,

We have not received any response from you regarding today's deposition.

Please promptly confirm whether you will be sitting for your deposition today at 1 p.m. as noticed or if you will be insisting that we undertake the efforts to last-minute change your deposition to tomorrow at 9 a.m. via zoom.

Thank you,

**M.Annie Houghton-Larsen**  
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Pronouns: she, her, hers

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**From:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Sent:** Monday, December 30, 2024 7:17 AM  
**To:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>  
**Cc:** Joseph Cammarata, Esq. <[Joe@cammaratalawpc.com](mailto:Joe@cammaratalawpc.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>  
**Subject:** Re: Freeman v. Giuliani - Court Order

Ted,

We are sorry to hear you aren't fully recovered. As you know, we've been planning for your deposition today for weeks. And as I emailed you repeatedly, cancelling your deposition at this late time requires cancelling and rescheduling a court reporter, videographer, and cancelling food orders, to say nothing about disrupting attorney schedules. Can you explain why there is a meaningful difference between today at 1 p.m. today when your deposition is noticed and tomorrow at 9 a.m.? While we could accommodate your request, it will not be without significant expense and effort as there are two other depositions scheduled for tomorrow at the same time. Wouldn't you rather just sit for the deposition today as noticed?

Please let me know,

Annie

—

On December 30, 2024 at 6:23:25 AM EST, Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)> wrote:

\*\*\* EXTERNAL EMAIL \*\*\*

Hi all. I need 24 hours. I'm just recovering and not prepared for a 9 am ET zoom.

Can we reschedule for 24 hours due to illness recovery, which I have kept you apprised on.

Thank you for your understanding.

Ted Goodman

**M.Annie Houghton-Larsen**

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Pronouns: she, her, hers

On Tue, Dec 24, 2024, 1:19 PM Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)> wrote:

Mr. Goodman,

You have been properly served with a subpoena that requires you to appear on Monday 12/30. We have asked if you could inform us whether you intend to appear to avoid us spending unnecessary and non-refundable costs if you have no intentions of appearing. But to be clear: it is our position your attendance is required and you should not construe our email to imply otherwise.

If you do not appear on Monday at 9:00 a.m. at Willkie's New York office, we reserve all rights to seek relief from the Court for your continued noncompliance.

Thank you,

**M.Annie Houghton-Larsen**

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Pronouns: she, her, hers

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**From:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>

**Sent:** Monday, December 23, 2024 6:12 PM

**To:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>

**Cc:** Joseph Cammarata, Esq. <[Joe@cammaratalawpc.com](mailto:Joe@cammaratalawpc.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>

**Subject:** Re: Freeman v. Giuliani - Court Order

\*\*\* EXTERNAL EMAIL \*\*\*

Annie!

It is not my intention to disregard court orders. I'm compiling information requested.

I will have to get back to you regarding Dec. 30th as I am recovering from an awful sickness and I'm still under the weather.

Ted

On Mon, Dec 23, 2024, 5:28 PM Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)> wrote:

Mr. Goodman,

You were properly served with a deposition subpoena noticing your deposition for December 30, 2024 in New York. As such, we are planning for your deposition—this includes hiring a court reporter and a videographer, organizing breakfast and lunch, and asking Willkie staff to be in the office and working during the holiday week. **To the extent you do not plan to appear at the deposition, we ask that you please advise us now, so that we may cancel these efforts and avoid the unnecessary burden, expense, and inconvenience (including to third parties).** If you do not respond to this email and do not appear on December 30, we reserve the right to seek relief with the Court relating to the failure to appear or to mitigate our costs.

Additionally, we remind you that you have not complied with the Court's order to produce all documents responsive to Plaintiffs' document subpoena. If you do not promptly produce all responsive documents, Plaintiffs will have no choice but to hold your deposition open (meaning that we could continue to depose you after December 30) and to move for sanctions against you in the New Year.

Thank you,

**M. Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**

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Pronouns: she, her, hers



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**From:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Sent:** Thursday, December 19, 2024 9:39 AM  
**To:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>  
**Cc:** Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>  
**Subject:** RE: Freeman v. Giuliani - Court Order

Plaintiffs do not consent to your request as we do not believe it is appropriate given that the Court-ordered deadline has already passed. However, should you file a request for extension with the Court, Plaintiffs do not intend to file a response.

For clarity, should you file a request, you can copy and paste the above as Plaintiffs' position.

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Pronouns: she, her, hers

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**From:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>  
**Sent:** Thursday, December 19, 2024 9:14 AM  
**To:** Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>  
**Cc:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>  
**Subject:** Re: Freeman v. Giuliani - Court Order

\*\*\* EXTERNAL EMAIL \*\*\*

What does this mean?

Does this mean you won't contest my request for an extension?

"you can report that Plaintiffs do not intend to file a response to your request, but do not consent to any extension given that your deposition is scheduled for 12/30"

On Thu, Dec 19, 2024, 8:59 AM Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)> wrote:

Mr. Goodman: I'm very sorry to hear you've been sick, and I hope you have a speedy recovery. Unfortunately, because today's deadline is a court-ordered deadline it's not something that we can extend by agreement. You would have to seek an extension from the Court. If you do seek an extension, you can report that Plaintiffs do not intend to file a response to your request, but do not consent to any extension given that your deposition is scheduled for 12/30 and we have yet to receive any documents.

Best,

**Aaron E. Nathan**  
**Willkie Farr & Gallagher LLP**

787 Seventh Avenue | New York, NY 10019-6099  
Direct: [+1 212 728 8904](tel:+12127288904) | Fax: +1 212 728 8111  
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**From:** Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)>

**Sent:** Thursday, December 19, 2024 4:40 AM

**To:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>

**Cc:** Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; Goverski, Meryl Conant  
<[MGoverski@willkie.com](mailto:MGoverski@willkie.com)>

**Subject:** Re: Freeman v. Giuliani - Court Order

\*\*\* EXTERNAL EMAIL \*\*\*

I am asking for Monday, because I am hopeful to be better by Friday and then can use weekend to get things in order.

On Thu, Dec 19, 2024, 4:38 AM Ted Goodman <[tedgoodman81@gmail.com](mailto:tedgoodman81@gmail.com)> wrote:

Hi Aaron, Annie and team,

I have been sicker than a dog for the past two days (I can show proof if necessary, and this is why im emailing you at such an odd hour).

I am asking for an extension, as it is not my intention to not cooperate with the Court's order.

Would you please grant me an extension until Monday (so I can use weekend to get everything in order).

I am asking that, due to an un-anticipated sickness, I am granted additional time to comply.

Thank you for your understanding. I am never sick, so this is quite frustrating. Again, I am willing to show proof if necessary.

Best,

Ted Goodman  
(906) 231-5849

On Sat, Dec 14, 2024, 7:16 PM Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)> wrote:

Mr. Goodman,

Please see attached a Court order. For your convenience, I have also attached the document subpoena.

Thank you,

**M. Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: [+1 212 728 8164](tel:+12127288164) | Fax: +1 212 728 9164  
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